

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

In re:

**THE MORGAN CENTER, INC.
Debtor.**

**CASE NO. 19-13278-BFK
CHAPTER 7**

**SUPPLEMENTAL RESPONSE IN OPPOSITION
TO MICHAEL HANDBERG'S OBJECTION TO
CLAIM OF CAMPBELL FLANNERY, PC**

COMES NOW Campbell Flannery, PC, ("CF") by counsel, and for its Supplemental Response in Opposition to Michael Handberg's ("Handberg") Objection to Claim of Campbell Flannery, PC, states as follows:

1. Exhibit A (CF 0001-0021) to the Response filed by CF on June 10, 2020 comprised of the engagement agreement, assignment agreement and invoices reflecting the services provided by CF.
2. The engagement agreement contemplated two separate scopes of work – (1) responding to an appeal on behalf of Dr. Goldberg before the Virginia Supreme Court ("Appeal"); and (2) defending the new "Fairfax Litigation." The Fairfax Litigation was a claim by Handberg against The Morgan Center, Inc. ("TMC") and Northern Virginia Advocacy and Counseling Services, Inc. ("NVACS").

3. Invoices (CF 0005-0021) total \$112,857.24. Fees and costs associated with defending the appeal to the Virginia Supreme Court total \$34,434.13.

4. In preparing its Proof of claim CF mistakenly included the costs of the transcripts for the Appeal in the amount of \$2,332.50 (See CF 0006). Consequently, CF's amended claim is \$78,423.11. For the Court's reference, entries for fees and costs associated with the Appeal are highlighted in the invoices attached hereto.

WHEREFORE CAMPBELL FLANNERY, PC, by counsel, respectfully requests this Court enter an Order overruling Michael Handberg's Objection to its Proof of Claim; and such further relief as this Court deems appropriate.

CAMPBELL FLANNERY, PC
By Counsel



/s/ James P. Campbell

James P. Campbell, Esq. (VSB #25097)
CAMPBELL FLANNERY, P.C.
1602 Village Market Blvd. #220
Leesburg, VA 20175
(703) 771-8344 telephone
(703) 771-1485 facsimile
Counsel for the Defendant

CERTIFICATE OF SERVICE

I hereby certify that service of a true copy of the foregoing has been made as follows:

Type of Service: Electronic Mail via ECF through the United State
Bankruptcy Court and First Class Mail

Date of Service: June 25, 2020

Persons served and address: Kevin M. O'Donnell, Esq.
Jeffery T. Martin, Jr., Esq.
Henry & O'Donnell, P.C.
300 N. Washington Street, Suite 204
Alexandria, Virginia 22314

Office of the U.S. Trustee
1725 Duke Street, Suite 650
Alexandria, Virginia 22314

Ann E. Schmitt (VSB #22030)
Culbert & Schmitt, PLLC
40834 Graydon Manor Lane
Leesburg, Virginia 20175

Item Served: Supplemental Response in Opposition to Michael
Handberg's Objection to Claim of Campbell Flannery,
PC



James P. Campbell
James P. Campbell

CAMPBELL FLANNERY, PC
1602 Village Market Boulevard, Suite 225
Leesburg, VA 20175
Ph:703-771-8344 Fax:703-771-8345

Jon & Felicia Goldberg
100 West Main Street #3
Berryville, VA 22611

PREBILL

October 2, 2019

File #: 1278-001
Inv #: Sample

RE: v. Michael Handberg

*HB =
\$321,885.41*

DATE	ATTY	DESCRIPTION	HOURS	AMOUNT
Sep-03-19	JPC	Calendar Control; Update Discovery Production	1.10 \$500.00	550.00
Sep-05-19	JPC	Conference with Clients; Trial Preparation	1.20 \$500.00	600.00
	SLP	prepare exhibits and witness lists; finalize and forward to court and opposing counsel	1.10 \$175.00	192.50
Sep-06-19	SLP	amend exhibit list; forward to court an opposing counsel	0.60 \$175.00	105.00
Sep-10-19	MLC	Review and Respond to Email from Opposing Counsel	0.10 \$350.00	35.00
Sep-12-19	MLC	Conference with Jim and Trial Preparation; Revise Protective Order	0.70 \$350.00	245.00
Sep-13-19	MLC	Draft Response in opposition to Motion to Quash; Travel to and from the Circuit Court; Attend Hearing on Motion to Compel/Motion to Terminate Deposition; Email to Opposing Counsel	3.90 \$350.00	1,365.00
Sep-16-19	JPC	Teleconference with Clients	0.90 \$500.00	450.00

	JPC	Prepare Objections to Exhibits	1.60	\$500.00	800.00
	JPC	Review Exhibits; Draft Objections to Plaintiff's Exhibits	2.20	\$500.00	1,100.00
	MLC	Trial Preparation; Conference with Client	1.40	\$350.00	490.00
Sep-17-19	MLC	Review Objections to Exhibits	0.30	\$350.00	105.00
Sep-19-19	MLC	Draft Trial Memorandum; Prepare for Trial	8.30	\$350.00	2,905.00
Sep-21-19	MLC	Draft Motion to Reconsider re Res Judicata and Trial Memorandum	6.80	\$350.00	2,380.00
Sep-22-19	JPC	Trial Prep	1.80	\$500.00	900.00
	MLC	Draft Motion to Reconsider re Res Judicata and Trial Memorandum	5.60	\$350.00	1,960.00
Sep-23-19	JPC	Travel to Court and Prepare for Trial	2.30	\$500.00	1,150.00
	JPC	Attend Trial and Return Travel	5.40	\$500.00	2,700.00
	MLC	Prepare for Trial; Travel to and from Trial; Attend Trial	10.00	\$350.00	3,500.00
Sep-24-19	JPC	Travel to and Attend Trial	7.80	\$500.00	3,900.00
	MLC	Prepare for Trial; Travel to and from Trial; Attend Trial	10.00	\$350.00	3,500.00
Sep-25-19	JPC	Post-Trial Conference with Mr. Rogan and Mr. Clark	1.20	\$500.00	600.00
	MLC	Email to Clients; Conference with Jim and Chris Rogan; Conference with Jim and Suzy	2.90	\$350.00	1,015.00
Sep-26-19	JPC	Review and Edit Post-Trial Memo	0.40	\$500.00	200.00
	MLC	Draft Post-Trial Memorandum of Law; Draft Letter to Chambers	1.60	\$350.00	560.00
	Totals		79.20		\$31,307.50

DISBURSEMENTS

	Filing Fee	26.50
Aug-20-19	Court reporter - Veteran Reporters	1,071.40
Aug-28-19	Costs advanced - Casamo Court Reporting - Copy of Transcript	336.95
Sep-03-19	Federal Express on 8/29/19 to Clerk, Fairfax County	19.32
Sep-10-19	Federal Express on 9/5/19 to Clerk, Fairfax County	19.37
Sep-17-19	Federal Express on 9/6/19 to Clerk, Fairfax County	19.37
Sep-20-19	Costs advanced - Cavalier CPS	85.00

Totals	\$1,577.91
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Total Fee & Disbursements

\$32,885.41

Previous Balance

79,223.09

Balance Now Due

\$112,108.50

CAMPBELL FLANNERY, PC

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Jon & Felicia Goldberg
100 West Main Street #3
Berryville, VA 22611

January 8, 2019

File #: 1278-001

Inv #: 1223

$\$450 = HB$

RE: v. Michael Handberg

DATE	ATTY	DESCRIPTION	HOURS	AMOUNT
Dec-05-18	SLP	Review Pleadings; Letter to Duff	0.30 \$175.00	52.50
Dec-06-18	JPC	Teleconference with Chris and Jon	0.20 \$500.00	100.00
	JPC	Teleconference with Mr. Rogan	0.40 \$500.00	200.00
Dec-07-18	JPC	Review of Opposition to Petition for Appeal	0.60 \$500.00	300.00
Dec-10-18	SLP	Draft Motion to Extend; Research Rules	0.70 \$175.00	122.50
	SLP	Arrange for Trial Transcripts	0.30 \$175.00	52.50
Dec-12-18	JPC	Review of Trial Transcript	0.80 \$500.00	400.00
Dec-13-18	JPC	Court Appearance for Scheduling	0.90 \$500.00	450.00
Dec-14-18	JPC	Teleconference with Dave Robelen; Letter to Clerk	0.20 \$500.00	100.00
	JPC	Teleconference with Chris Rogan and Clients re Status of Supreme Court Brief	0.20 \$500.00	100.00
Dec-16-18	JPC	Review and Edit Brief in Support of Plea in Bar	1.10 \$500.00	550.00

Dec-26-18	JPC	Review Highland 1 & 2 for Appreciation to the Facts	1.20	\$500.00	600.00
	JPC	Review of Trial Transcript	0.80	\$500.00	400.00
Dec-31-18	JPC	Review of 2/22 and 2/23 Trial Transcripts	2.20	\$500.00	1,100.00
	JPC	Conference with Chris Rogan	0.70	\$500.00	350.00
Totals			10.60		\$4,877.50

DISBURSEMENTS

Dec-10-18	Costs advanced - Casamo & Associates	417.00
	Court reporter - Veteran Reporter Transcript (Trial)	1,058.50
Jan-03-19	Court reporter - Veteran Reporters Transcript (Hearing)	857.00
Totals		\$2,332.50

Total Fee & Disbursements	\$7,210.00
Trust Transferred at Billing	1,445.00
Balance Now Due	\$5,765.00

PAYMENT DETAILS

Jan-08-19	Payment for invoice: 1223	1,445.00
Total Payments		\$1,445.00

TRUST STATEMENT

		Disbursements	Receipts
Dec-11-18	Received From: Jon & Felicia Goldberg Payment by check - thank you		1,445.00
Jan-08-19	Paid To: CAMPBELL FLANNERY, PC Payment for invoice: 1223	1,445.00	
	Total Trust	<hr/> \$1,445.00	<hr/> \$1,445.00
	Trust Balance		\$0.00

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Jon & Felicia Goldberg
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Berryville, VA 22611

March 6, 2019

File #: 1278-001

Inv #: 1401

\$3600 = HB

RE: v. Michael Handberg

DATE	ATTY	DESCRIPTION	HOURS	AMOUNT
Jan-09-19	JPC	Draft Brief in Opposition	2.10 \$500.00	1,050.00
Jan-10-19	SLP	Edit Brief in Opposition	0.90 \$175.00	157.50
Jan-11-19	SLP	Edit Brief in Opposition	1.20 \$175.00	210.00
Jan-14-19	MLC	Research Law re Waiver of Arguments on Appeal	1.10 \$350.00	385.00
Jan-15-19	MLC	Research VA Law Regarding Waiver of Objections to Jury Instructions and Draft Memorandum and Rule Block Summarizing Research Findings; Conference with Jim Discussing Legal Theories to Raise on Appeal	4.50 \$350.00	1,575.00
	SLP	Edit Brief	0.90 \$175.00	157.50
Jan-16-19	JPC	Research, Draft and Edit Opposition Brief	6.20 \$500.00	3,100.00
	JPC	Research, Draft and Edit Opposition Brief	5.10 \$500.00	2,550.00
	MLC	Review Draft Appellee's Brief; Conferences with Jim; Revise Draft Appellee's Brief	2.10 \$350.00	735.00
	SLP	Teleconference with Chris Rogan	0.10 \$175.00	17.50

	SLP	Edit Brief	1.60	\$175.00	280.00
Jan-17-19	JPC	Research, Draft and Edit Opposition Brief	4.20	\$500.00	2,100.00
Jan-18-19	JPC	Research and Edit Opposition Brief on Appeal	6.30	\$500.00	3,150.00
	JPC	Review Transcript and Edit Appeal Brief	3.20	\$500.00	1,600.00
	MLC	Conference with Jim; Review Handberg's Brief; Review and Revise Appellee's Brief	3.10	\$350.00	1,085.00
	SLP	Edit Brief	5.20	\$175.00	910.00
Jan-19-19	SLP	Edit Brief	1.80	\$175.00	315.00
Jan-20-19	JPC	Review and Edit Appeal Brief	2.70	\$500.00	1,350.00
	SLP	Review Transcript; Edit Brief	3.40	\$175.00	595.00
Jan-21-19	JPC	Final Research Review of the Record and Edits to Appeal Brief	3.30	\$500.00	1,650.00
	MLC	Review and Respond to Email from Rogan; Conference with Jim and John; Conference with Jim and Rogan; Review Transcript, Review Hyland	2.50	\$350.00	875.00
	SLP	Final Edits to Brief; Email Printer	1.80	\$175.00	315.00
Jan-22-19	JPC	Final Edits to Appeal Brief	0.60	\$500.00	300.00
	JPC	Conference Call with Matthew Lee and Chris Rogan re Fairfax State Court	0.30	\$500.00	150.00
	JPC	Teleconference with Chris Rogan	0.40	\$500.00	200.00
	JPC	Teleconference with Mr. Rogan and Jon and Felicia Goldberg	0.30	\$500.00	150.00
	MLC	Review Appellate Brief	0.80	\$350.00	280.00
	SLP	Emails to/from Lex Group	0.40	\$175.00	70.00
Jan-23-19	JPC	Preparation for Hearing in Fairfax	1.30	\$500.00	650.00

Jan-24-19	JPC	Preparation for and Attend Hearing	3.50	\$500.00	1,750.00
	JPC	Return Travel	0.50	\$500.00	250.00
Feb-05-19	MLC	Review Handberg's Appellate Reply Brief	0.20	\$350.00	70.00
Feb-09-19	JPC	Teleconference with Mr. Rogan	0.60	\$500.00	300.00
	JPC	Teleconference with Mr. Rogan, Dr. and Mrs. Goldberg	0.30	\$500.00	150.00
Totals			72.50		\$28,482.50

DISBURSEMENTS

Jan-01-19	Federal Express on 12/14/18 to Supreme Court of Virginia	33.11	
Jan-31-19	Costs advanced to The Lex Group	657.87	
Totals		\$690.98	
Total Fee & Disbursements			\$29,173.48
Previous Balance			5,765.00
Payments (See Details Below)			887.50
Balance Now Due			\$34,050.98

PAYMENT DETAILS

Jan-14-19	Payment by check - thank you	887.50
Total Payments		\$887.50

CAMPBELL FLANNERY, PC

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Jon & Felicia Goldberg
100 West Main Street #3
Berryville, VA 22611

August 5, 2019

File #: 1278-001

Inv #: 1811

\$20,957.70 = HB

RE: v. Michael Handberg

DATE	ATTY	DESCRIPTION	HOURS	AMOUNT
Mar-01-19	JPC	Email to Clients re Next Steps	0.30 \$500.00	150.00
	JPC	Travel to and Return from Court	1.10 \$500.00	550.00
	JPC	Court Appearance	0.80 \$500.00	400.00
Mar-04-19	JPC	Review of Documents from Client	0.40 \$500.00	200.00
	JPC	Teleconference with Clients and Chris Rogan	1.40 \$500.00	700.00
Mar-12-19	MLC	Research Law re Orders that are Void Ab Initio vs. Orders that are Voidable	0.50 \$350.00	175.00
Mar-13-19	JPC	Teleconference with Mr. Petersen	0.20 \$500.00	100.00
	JPC	Review of 330 f. 3d875 and Conference Call with Mr. Rogan	0.40 \$500.00	200.00
	JPC	Prepare Answer	0.60 \$500.00	300.00
Mar-14-19	JPC	Conference with Clients	2.40 \$500.00	1,200.00
Apr-02-19	JPC	Draft and File Discovery Responses	1.10 \$500.00	550.00

	JPC	Teleconference with Jon Goldberg	0.60	\$500.00	300.00
Apr-04-19	JPC	Draft and Edit Discovery Responses	1.10	\$500.00	550.00
	JPC	Teleconference with Dr. and Mr. Goldberg	0.30	\$500.00	150.00
Apr-14-19	MLC	Travel to Supreme Court Hearing	1.00	\$350.00	0.00
	MLC	Prepare for Supreme Court Hearing	0.50	\$350.00	175.00
	MLC	Attend Supreme Court Hearing	1.00	\$350.00	0.00
	MLC	Travel Back from Supreme Court	2.50	\$350.00	0.00
	MLC	Discuss Bankruptcy Matters	0.80	\$350.00	280.00
Apr-15-19	JPC	Travel to and Prepare for Hearing	2.60	\$500.00	1,300.00
Apr-16-19	JPC	Prepare for Hearing	1.60	\$500.00	800.00
	JPC	Court Appearance at Supreme Court	1.60	\$500.00	800.00
	JPC	Discussion of State Court Options and Return Travel	1.40	\$500.00	700.00
Apr-22-19	JPC	Review and Respond to Requests for Admission	1.20	\$500.00	600.00
	MLC	Conference with Jim; Research Law re Admissions	0.80	\$350.00	280.00
May-02-19	JPC	Hotel Costs Advanced for Oral Argument	0.00	\$500.00	711.38
	MLC	Draft Objections to Requests for Admissions	1.20	\$350.00	420.00
May-06-19	MLC	Review Caselaw re Objections	0.10	\$350.00	35.00
May-10-19	MLC	Review and Respond to Email from Opposing Counsel re Motion to Compel	0.20	\$350.00	70.00
May-16-19	JPC	Review and Edit Opposition to Motion to Compel	0.40	\$500.00	200.00
	MLC	Draft Opposition to Motion to Compel	2.10	\$350.00	735.00

May-17-19	SLP	Edit, Finalize and Arrange for Delivery of Opposition to Motion to Compel	0.80	\$175.00	140.00
May-22-19	JPC	Teleconference with Clients and Mr. Clark re Discovery	0.40	\$500.00	200.00
	JPC	Teleconference with Mr. Rogan and Mr. Lee re Attorney-Client Privilege Issues	0.60	\$500.00	300.00
	JPC	Teleconference with Mr. Rogan and Mr. Goldberg	0.30	\$500.00	150.00
	MLC	Telephone Call to Conciliator; Conference with Jim	1.20	\$350.00	420.00
May-23-19	MLC	Conference with JPC; telephone call to Concilator re: Motion to Compel; telephone call from Rogan	0.90	\$350.00	315.00
May-29-19	MLC	Draft Affidavit and Order; Review and Respond to Emails from Opposing Counsel; Telephone Call from Client	2.70	\$350.00	945.00
May-30-19	MLC	Email to Clients; Email to Opposing Counsel; Review and Respond to Email from Opposing Counsel; Telephone Call to CR	2.10	\$350.00	735.00
Jun-04-19	MLC	Correspond with Chris Rogan and Opposing Counsel re Motion to Compel	0.30	\$350.00	105.00
Jun-06-19	MLC	Email to Chris Rogan	0.40	\$350.00	140.00
Jun-07-19	MLC	Review and Respond to Email from Opposing Counsel; Telephone Conference with Chris Rogan	1.40	\$350.00	490.00
Jun-21-19	MLC	Review Draft Language re Discovery	0.20	\$350.00	70.00
Jun-25-19	MLC	Telephone Call from Client	0.20	\$350.00	70.00
Jun-28-19	MLC	Draft Supplemental Discovery Responses	1.80	\$350.00	630.00
	SLP	scan and bates label bank statements; edit letter to opposing counsel	0.60	\$175.00	105.00
Jul-01-19	MLC	Review and Respond to Correspondence from Opposing Counsel; Review File	1.60	\$350.00	560.00
Jul-02-19	MLC	Email to Chris Rogan; Email to Opposing Counsel	0.60	\$350.00	210.00

Jul-03-19	MLC	Respond to Opposing Counsel	0.10	\$350.00	35.00
Jul-15-19	JPC	Review and Edit Discovery Requests	0.70	\$500.00	350.00
	SLP	draft first interrogatories and requests for production to plaintiff	0.90	\$175.00	157.50
Jul-16-19	MLC	Review Discovery	0.30	\$350.00	105.00
	SLP	edit and finalize discovery to plaintiffs	0.60	\$175.00	105.00
Jul-17-19	JPC	Conference Call with Opposing Counsel	0.30	\$500.00	150.00
	MLC	Draft Motion for Protective Order and Response in Opposition to Motion to Compel	4.40	\$350.00	1,540.00
	SLP	edit and finalize letter to opposing counsel; praecipe for response and motion for protective order	0.20	\$175.00	35.00
Jul-19-19	SLP	prepare praecipe continuing motion for protective order	0.20	\$175.00	35.00
Jul-22-19	MLC	Telephone Call to Chambers; Review Order	0.30	\$350.00	105.00
Totals			54.30		\$20,833.88

DISBURSEMENTS

Mar-26-19	Federal Express on 3/21/19 to Clerk, Fairfax County Circuit Court	19.41
May-17-19	Costs advanced - Cavalier Courier	85.00
Jul-23-19	Federal Express on 7/17/19 to Clerk, Fairfax County	19.41
Totals		\$123.82

Total Fee & Disbursements
 Previous Balance

\$20,957.70
 34,050.98

Balance Now Due

\$55,008.68

CAMPBELL FLANNERY, PC

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Jon & Felicia Goldberg
100 West Main Street #3
Berryville, VA 22611

September 5, 2019

File #: 1278-001

Inv #: 1950

\$22,862.50 = HB

RE: v. Michael Handberg

DATE	ATTY	DESCRIPTION	HOURS	AMOUNT
Aug-01-19	JPC	Review Motion to Amend by Handberg	0.30 \$500.00	150.00
	JPC	Teleconference with Mr. Clark	0.30 \$500.00	150.00
	JPC	Teleconference with Mr. Goldberg	0.50 \$500.00	250.00
	MLC	Review Motion to Amend; Conference with Jim; REview Successor Liability Case Law	3.80 \$350.00	1,330.00
	SLP	prepare and forward notice of deposition; arrange for court reporter	0.20 \$175.00	35.00
Aug-02-19	MLC	Create Template for Case Law Analysis	0.30 \$350.00	105.00
Aug-06-19	JPC	Teleconference with Dr. Goldberg Regarding Consent to Amendment and Trial Preparation	0.60 \$500.00	300.00
	MLC	Conference with Client and Jim; Conference with Jim and Chris Rogan	1.00 \$350.00	350.00
Aug-07-19	MLC	Telephone Call from Client; Draft Deficiency Letter	1.00 \$350.00	350.00
Aug-08-19	JPC	Review of Handberg Discovery Responses and Documents Produced	1.80 \$500.00	900.00

	MLC	Email to Opposing Counsel and Clients; Review Discovery Production	3.30	\$350.00	1,155.00
Aug-09-19	MLC	Review Discovery Production; Draft Deficiency Letter	3.10	\$350.00	1,085.00
Aug-12-19	JPC	Prepare Letters and Emails to Opposing Counsel re Handberg's Deposition	0.90	\$500.00	450.00
	JPC	Trial and Deposition Preparation with Clients and Matthew	2.80	\$500.00	1,400.00
	MLC	Prepare for Client Meeting; Conference with Client/Deposition Preparation; Review and Respond to Email from Opposing Counsel	5.40	\$350.00	1,890.00
Aug-14-19	MLC	Draft Discovery Dispute Chart	0.30	\$350.00	105.00
Aug-15-19	MLC	Conference with Client re Deposition Preparation	2.30	\$350.00	805.00
Aug-16-19	MLC	Travel to and from the Circuit Court of Fairfax County; Attend Hearing on Motion to Compel; Conference with Jim and Chris Rogan	6.20	\$350.00	2,170.00
Aug-19-19	JPC	Travel to and Attend Dr. Goldberg's Depo; Return Travel	4.20	\$500.00	2,100.00
	MLC	Telephone Call from Jim	0.20	\$350.00	70.00
Aug-20-19	JPC	Preparation for Deposition	1.20	\$500.00	600.00
	JPC	Conduct Handberg Deposition	3.20	\$500.00	1,600.00
	MLC	Preparation for Deposition; Deposition of M. Handberg; Draft Letter to Opposing Counsel	4.10	\$350.00	1,435.00
	SLP	prepare exhibits for deposition	0.80	\$175.00	140.00
Aug-21-19	MLC	Review and Respond to Client Email; Review Documents	0.30	\$350.00	105.00
Aug-22-19	JPC	Review of Supreme Court Decision	0.40	\$500.00	200.00
	JPC	Conference with Matthew and Suzy	0.60	\$500.00	300.00
	JPC	Conference with Chris Rogan	0.50	\$500.00	250.00

	JPC	Conference with Clients	0.50	\$500.00	250.00
	MLC	Conference Call with Jim and Chris Rogan	0.50	\$350.00	175.00
	SLP	conference with JPC, MLC and CLR re supreme court decision and next steps	0.90	\$175.00	157.50
	SLP	prepare subpoena duces tecum to RoganMiller Zimmerman; forward to eric zimmerman	0.40	\$175.00	70.00
	SLP	review files from david duff	0.30	\$175.00	52.50
Aug-23-19	MLC	Conferences with Jim; Review File	0.80	\$350.00	280.00
	MLC	Review Supplemental Discovery	0.20	\$350.00	70.00
	SLP	prepare supplemental discovery response	0.30	\$175.00	52.50
Aug-26-19	MLC	Conf. with JPC & client; Draft Motion to Compel	1.90	\$350.00	665.00
Aug-27-19	MLC	Draft Motion to Compel	3.40	\$350.00	1,190.00
Aug-28-19	MLC	Draft Motion to Compel	1.20	\$350.00	420.00
Aug-29-19	MLC	Finalize Motion to Compel	2.50	\$350.00	875.00
	SLP	prepare answer to amended complaint; finalize and forward to court and opposing counsel	0.90	\$175.00	157.50
	Totals		63.40		\$24,195.00

- 1332.50 appeal

DISBURSEMENTS

Jul-30-19	Federal Express on 7/19/19 to Clerk, Fairfax County	19.41
Totals		\$19.41

\$22,862.50

Total Fee & Disbursements

\$24,214.41

Previous Balance

55,008.68

Balance Now Due

\$79,223.09

CAMPBELL FLANNERY, PC

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Leesburg, VA 20175

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Fax:703-771-8345

Jon & Felicia Goldberg
100 West Main Street #3
Berryville , VA 22611

September 5, 2019

File #: 1278-002

Inv #: 1951

RE: Appeal

DATE	ATTY	DESCRIPTION	HOURS	AMOUNT
Aug-27-19	MLC	Review Decision; Conference Call with Jim and Chris Rogan	2.50 \$350.00	875.00
	Totals		2.50	<hr/> \$875.00
	Total Fee & Disbursements			<hr/> \$875.00
	Balance Now Due			<hr/> \$875.00